

# *Exhibit Z*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION

---

ARIANE ROWLAND, and  
JAMIE SCHULZE,

Cause No.  
CV-20-59-BLG-SPW

Plaintiffs,

vs.

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
NEW YORK, INC., and  
WATCH TOWER BIBLE AND  
TRACT SOCIETY OF  
PENNSYLVANIA,

Defendants.

---

VIDEO-RECORDED DEPOSITION UPON ORAL EXAMINATION OF  
ARIANE ROWLAND

---

BE IT REMEMBERED, that the video-recorded deposition upon oral examination of ARIANE ROWLAND, appearing at the instance of Defendants Watchtower Bible and Tract Society of New York, Inc., was taken at the offices of Fisher Court Reporting, 2711 1st Avenue North, Billings, Montana, on Tuesday, November 8, 2022, beginning at the hour of 9:16 a.m., pursuant to the Federal Rules of Civil Procedure, before Barbara J. Batts, Registered Merit Reporter, Certified Realtime Reporter, and Notary Public.

\* \* \* \* \*

Ariane Rowland

1 A. I was told he's dead.

2 Q. When do you -- when do you have -- when do  
3 you recall Mr. Haines sexually abusing you?

4 A. I don't have specific dates. I'd have to  
5 say probably between -- between five and, like,  
6 nine.

7 Q. Okay.

8 A. Nine or ten.

9 Q. And Mr. Haines, what -- what type of  
10 misconduct, criminal misconduct, did Mr. Haines  
11 engage in with you?

12 A. You mean, like, what did he do to me?

13 Q. Uh-huh.

14 A. He used to chase me around the house. He  
15 used to touch me inappropriately. He would make me  
16 touch him. And then his daughters would be  
17 involved sometimes.

18 He liked to make me and Jolene do things,  
19 and then sometimes he would have sex with Carla in  
20 front of us.

21 Q. Okay. Let's unpack it. First you said,  
22 "he would chase me around the house." Whose house  
23 would he --

24 A. His house.

25 Q. His house. So you would go to the Haines'